<u>REMARKS</u>

This application has been carefully reviewed in light of the Office Action dated October 7, 2008. Claim 20 has been cancelled without prejudice or disclaimer of subject matter. Claims 1 to 12, 18 and 26 to 33 are pending in the application, of which Claims 1, 7 and 18 are in independent form. Reconsideration and further examination are respectfully requested.

Claims 1 to 12, 18, 20 and 26 to 33 were rejected under 35 U.S.C. § 102(e) over U.S. Patent Application Publication No. 2002/0087602 (Masuda). Reconsideration and withdrawal of the rejection are respectfully requested.

The claims herein generally concern processing a layer structured document having respective layers of a book, a chapter and a page. A book contains at least one chapter having a specific attribute, each of at least one chapter contains at least one page, and each of at least one page has a print attribute. An instruction of inserting designated data into a designated position of the layer structured document including the chapters is accepted from a user. A determination is made as to whether a type of the designated data is image data or data other than image data. Responsive to a determination that the type of the designated data is data other than image data, the document is edited so as to create a new chapter at the designated position of the document, and then to insert a page formed with the designated data into the new chapter. Responsive to a determination that the type of the designated data is image data, the document is edited so as to insert a page formed with the designated data into an existing chapter at the designated position of the document, without creating a new chapter.

Applicants submit that Masuda is not seen to disclose or to suggest the foregoing arrangement, particularly the notion of processing a layer structured document having respective layers of a book, a chapter and a page. More particularly, Masuda is not seen to disclose or to suggest at least the features of (i) processing a layer structured document having respective layers of a book, a chapter and a page, wherein a book contains at least one chapter having a specific attribute, each of at least one chapter contains at least one page, and each of at least one page has a print attribute, and (ii) responsive to a determination that a type of designated data is data other than image data, editing the document so as to create a new chapter at a designated position of the document, and then to insert a page formed with the designated data into the new chapter.

Masuda is believed to disclose composing an integrated electronic document composed of a plurality of kinds of electronic source documents. An electronic binder binds selected source document pages. Pages of the source document are displayed on a plurality of collection windows, and a generated electronic document is shown in a composed window by thumbnails representing pages. A page in a source document can be inserted into the generated electronic document, or deleted from the generated electronic document, by selecting and moving thumbnail images representing the pages between windows. Thus, Masuda is seen to disclose pages of source documents displayed in collection windows, and pages of a generated electronic document shown in a composed window.

On the other hand, the claims define a layer structured document having respective layers of a book, a chapter and a page. A book contains at least one chapter having a specific attribute, each of at least one chapter contains at least one page, and each

of at least one page has a print attribute. Responsive to a determination that a type of designated data is data other than image data, a new chapter is created at a designated position of the document. After the new chapter is created, a page formed with the designated data is inserted into the new chapter. Responsive to a determination that the type of the designated data is image data, no new chapter is created, and the document is edited so as to insert a page formed with the designated data into an existing chapter at the designated position of the document.

In contrast, Masuda discloses thumbnail images displayed in collection windows and a composed window. However, Masuda is believed to be silent on a layer structured document having respective layers of a book, a chapter and a page.

The Office Action alleges, at pages 6 and 7, that Masuda's collection windows can be broadly interpreted as being the claimed chapters. Applicants respectfully disagree.

Moreover, even if Masuda's collection windows might be seen by some to teach the claimed chapters, Masuda is silent on a layer structured document having respective layers of a book, a chapter and a page, much less a book layer that contains at least one chapter having a specific attribute. Masuda's collection windows merely display thumbnail images of pages of source documents. These electronic source documents are different from the generated electronic document whose pages are shown in the composed window. Thus, Masuda's windows merely display the contents of different documents, not different layers of the same document. Therefore, Masuda is believed to be silent on a layer structured document having respective layers of a book, a chapter and a page, much less a book layer that contains at least one chapter having a specific attribute.

Furthermore, although Masuda discloses inserting a page of a source document into the generated electronic document, Masuda is believed to be silent on creating a new chapter at a designated position of a document, and inserting a page formed with designated data into the new chapter after the new chapter is created.

Therefore, Masuda is not seen to disclose or to suggest the foregoing arrangement, particularly the notion of processing a layer structured document having respective layers of a book, a chapter and a page, and creating a new chapter. More particularly, Masuda is not seen to disclose or to suggest at least the features of (i) processing a layer structured document having respective layers of a book, a chapter and a page, wherein a book contains at least one chapter having a specific attribute, each of at least one chapter contains at least one page, and each of at least one page has a print attribute, and (ii) responsive to a determination that a type of designated data is data other than image data, editing the document so as to create a new chapter at a designated position of the document, and then to insert a page formed with the designated data into the new chapter.

In view of the foregoing amendments and remarks, independent Claims 1, 7 and 18, as well as the claims dependent therefrom, are believed to recite subject matter that would not have been obvious from the applied art, and are therefore believed to be in condition for allowance.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.